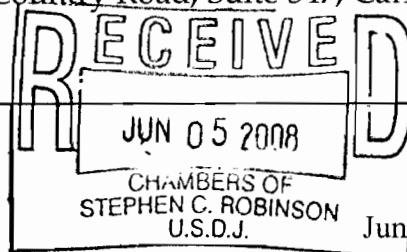


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Via Overnight Delivery

Hon. Magistrate Mark D. Fox
New York State Southern District Court
300 Quarropas Street
White Plains, NY 10601

MEMO ENDORSED

Re: *Smith v. Wyeth Pharmaceuticals*

Index No.: 2007-06116 07 CV 7843

Dear Hon. Magistrate Fox:

We represent the Plaintiff in the above referenced matter. We write, after conferring with opposing counsel, to jointly request an extension of discovery in this matter. Discovery is currently scheduled to conclude in this matter on June 16, 2008. While the parties have exchanged documentary discovery, this extension of time is necessitated due to scheduling issues that prevented the parties from concluding depositions prior to the close of discovery. We had served opposing counsel with Notices of Deposition and had scheduled depositions for June 3, 2008, but recently were advised that they could not appear on that date. Accordingly, I have conferred with opposing counsel, and we agreed to conduct Defendants deposition on June 19, 2008, provided Your Honor consents to an extension of discovery.

Based on the above, we respectfully request that Your Honor extend discovery through July 18, 2008 in order to allow the parties to conclude depositions and any additional discovery that may come to light through those depositions.

We thank you for your time and consideration of this request.

Respectfully submitted,

The Law Office of Steven A. Morelli, P.C.

Shannon K. Hynes

Shannon K. Hynes

APPLICATION GRANTED
Stephen C. Robinson

HON. STEPHEN C. ROBINSON 6/5/08

cc: James McQuade, Esq. (via facsimile)

